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**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtors.

Chapter 11

Case No. 19-34054 (SGJ)

Objection Deadline: November 13, 2020 @ 5:00 p.m.
(CT) Hearing Date: Scheduled only if necessary

**SUMMARY COVER SHEET FOR THE ELEVENTH MONTHLY APPLICATION
OF SIDLEY AUSTIN LLP FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
SEPTEMBER 1, 2020 TO AND INCLUDING SEPTEMBER 30, 2020**

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

Name of Applicant:	Sidley Austin LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors of Highland Capital Management, LP
Date of Retention:	October 29, 2019 by Order entered January 9, 2020
Period for which Compensation and Reimbursement is Sought:	September 1, 2020 – September 30, 2020
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$356,889.96 (80% of \$446,112.45)
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$2,204.73

This is a: ☒ monthly ☐ interim ☐ final application.

This is Sidley's ninth monthly fee application.

PRIOR MONTHLY APPLICATIONS FILED

		Requested		Approved		Outstanding	
Date Filed; Docket No.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
1/10/20; #343	10/29/19- 11/30/19	\$993,818.70	\$10,247.88	\$993,818.70	\$10,247.88	\$0.00	\$0.00
1/31/20; #420	12/1/19- 12/31/19	\$878,331.60	\$30,406.08	\$878,331.60	\$30,406.08	\$0.00	\$0.00
3/4/20; #501	1/1/20- 1/31/20	\$711,364.50	\$12,673.30	\$711,364.50	\$12,673.30	\$0.00	\$0.00
3/20/20; #542	2/1/20- 2/29/20	\$571,444.65	\$2,927.21	\$571,444.65	\$2,927.21	\$0.00	\$0.00
4/20/20; #594	3/1/20- 3/31/20	\$596,045.25	\$14,406.39	\$476,836.20	\$14,406.39	\$119,209.05	\$0.00
5/19/20; #639	4/1/20- 4/30/20	\$548,274.15	\$5,765.07	\$438,619.32	\$5,765.07	\$109,654.83	\$0.00
6/22/20; #767	5/1/20 – 5/31/20	\$429,530.85	\$2,758.75	\$343,624.68	\$2,758.75	\$85,906.17	\$0.00

		Requested		Approved		Outstanding	
Date Filed; Docket No.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses
7/20/20; #877	6/1/20 – 6/30/20	\$617,236.20	\$5,759.29	\$493,788.96	\$5,759.29	\$123,447.24	\$0.00
8/19/20; #969	7/1/20 – 7/31/20	\$663,867.90	\$10,470.96	\$531,094.32	\$10,470.96	\$174,880.61	\$0.00
9/19/20; #1074	8/1/20 – 8/31/20	\$584,416.35	\$2,448.22	\$467,533.08	\$2,448.22	\$584,416.35	\$2,448.22

**SUMMARY OF TOTAL FEES AND HOURS
BY ATTORNEYS AND PARAPROFESSIONALS**

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate	Total Hours Billed ²	Total Compensation
Suresh T. Advani	Partner Tax	1992	\$1,525	.80	\$1,220.00
Matthew A. Clemente	Partner Restructuring	1998	\$1,275	123.00	\$156,825.00
Paige H. Montgomery	Partner Litigation	2002	\$1,050	61.80	\$64,890.00
Andrew F. O'Neill	Partner Restructuring	2005	\$1,100	42.80	\$47,080.00
Penny R. Reid	Partner Litigation	1989	\$1,325	16.40	\$21,730.00
Simon M. Saddleton	Partner Investment Funds	2008	\$1,025	4.50	\$4,612.50
Dennis M. Twomey	Partner Restructuring	2000	\$1,275	10.80	\$13,770.00
Chuck Daly	Counsel Investment Funds	2002	\$985	.60	\$591.00
Mustafa Abdul-Jabbar	Associate Litigation	2016	\$840	.70	\$588.00
Elliot A. Bromagen	Associate Restructuring	2017	\$775	82.10	\$63,627.50
Patrick G. Foley	Associate Litigation	2013	\$955	40.40	\$38,582.00
Trevor M. Grayeb	Associate Restructuring	Pending	\$550	4.70	\$2,585.00
Juliana Hoffman	Associate Restructuring	2017	\$540	5.20	\$3,510.00

² Sidley charged the Debtor for only 50% of non-working travel time. Such reductions are reflected in the figures in this column.

Name	Position Area of Expertise	Year of Admission / Years of Experience	Hourly Billing Rate	Total Hours Billed²	Total Compensation
Chandler M. Rognes	Associate Litigation	2019	\$675	26.60	\$15,162.00
Alyssa Russell	Associate Restructuring	2015	\$885	48.30	\$42,745.50
Nancy P. Cade	Paralegal Litigation	30 years	\$390	3.20	\$1,248.00
David J. Lutes	Paralegal Restructuring	34 years	\$460	35.40	\$16,284.00
Danielle Griffith	Librarian Research Analyst	3 years	\$225	2.80	\$630.00
Total				510.10	\$495,680.50
10% Discount					\$49,568.05
Grand Total					\$446,112.45
Blended Rate					\$874.56

STATEMENT OF FEES AND EXPENSES BY PROJECT CATEGORY

Task Description	Total Hours	Total Fees
002 – Asset Disposition	.20	\$177.00
005 – Committee Meetings	29.50	\$28,886.50
006 – Business Operations	7.40	\$8,373.00
007 – Case Administration	34.40	\$34,238.50
008 – Claims Administration and Objections	33.00	\$36,035.00
009 – Corporate Governance and Board Matters	1.00	\$924.00
012 – Fee Applications	36.10	\$17,671.00
014 – Litigation	189.80	\$186,360.50
015 – Plan and Disclosure Statement	170.90	\$172,948.00
016 – Non-Working Travel ³	0.00	\$0.00
021 - Tax	.80	\$1,220.00
024 – Creditor Communications	7.00	\$8,847.00
TOTAL	510.10	\$495,680.50

³ As noted above, Sidley charged the Debtor for only 50% of non-working travel time.

EXPENSE SUMMARY

Category	Amount
Copying	\$127.02
Court Fees	\$100.00
Delivery Services/Messenger	\$89.36
Litigation Support Vendors	\$939.50
On-line Research Services (Westlaw, Lexis, Pacer and related services)	\$374.09
Postage	\$1.60
Telephone	\$205.86
Trial Transcripts	\$367.30
TOTAL:	\$2,204.73

**IN THE UNITED STATES BANKRUPTCY COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.¹

Debtors.

Chapter 11

Case No. 19-34054 (SGJ)

**ELEVENTH MONTHLY APPLICATION OF SIDLEY AUSTIN LLP FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM SEPTEMBER 1, 2020 THROUGH SEPTEMBER 30, 2020**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), and the Delaware Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, entered on November 14, 2019 [Docket No. 136] (the “Interim Compensation Procedures Order”), Sidley Austin LLP (“Sidley”), attorneys for the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned chapter 11 case (the “Chapter 11 Case”), hereby files this eleventh monthly application (this “Application”) for (a) interim allowance and payment of compensation for professional services to the Committee during the period from September 1, 2020 to and including September 30, 2020 (the “Fee Period”) in the amount of \$356,889.96, representing 80% of the \$446,112.45 of fees incurred by Sidley for professional services to the Committee during the Fee Period and (b) reimbursement of 100% of the actual and necessary expenses incurred by Sidley

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during the Fee Period in connection with such services in the amount of \$2,204.73. In support of this Application, Sidley respectfully represents as follows:

BACKGROUND

1. On October 16, 2019 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Delaware Court”). The Debtor has continued in possession of its properties and has continued to operate and manage its business as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. On October 29, 2019, the United States Trustee for the District of Delaware (the “U.S. Trustee”) filed its Notice of Appointment of Committee of Unsecured Creditors [Docket No. 65].

3. On November 14, 2019, the Delaware Court signed the Interim Compensation Procedures Order, authorizing certain professionals and members of any official committee (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to procedures specified therein. The Interim Compensation Procedures Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within twenty-one (21) days after service of the monthly fee application the Debtor is authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period ending December 31, 2019 and at three-month intervals or such other intervals convenient to the Court, each Professional shall file and serve an interim application for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

4. On December 4, 2019, the Delaware Court entered an order transferring venue of this case from the District of Delaware to the Northern District of Texas [Docket No. 1084].

5. The Committee retained Sidley as its bankruptcy counsel, *nunc pro tunc*, to October 29, 2019, pursuant to the *Order Authorizing the Retention and Employment of Sidley Austin LLP as Counsel to the Official Committee of Unsecured Creditors, Nunc Pro Tunc to October 29, 2019* [Docket No. 334] (the “Retention Order”). The Retention Order authorizes the Committee to compensate and reimburse Sidley in accordance with the terms and conditions set forth in the Committee’s application to retain Sidley, subject to Sidley’s application to the Court.

SUMMARY OF SERVICES RENDERED

6. Attached hereto as **Exhibit A** is a detailed statement of Sidley’s hours expended and fees incurred during the Fee Period. Sidley attorneys and paraprofessionals expended a total of 510.10 hours in connection with the Chapter 11 Case during the Fee Period. All services for which Sidley is requesting compensation were performed for or on behalf of the Committee. The services rendered by Sidley during the Fee Period are grouped into the categories set forth in **Exhibit A** and in the summary cover sheets prefixed to this Application. The attorneys and paraprofessionals who provided services to the Committee during the Fee Period are also identified in **Exhibit A** and in the summary cover sheets.

ACTUAL AND NECESSARY EXPENSES

7. Attached hereto as **Exhibit B** is a detailed statement of Sidley’s out-of-pocket expenses incurred during the Fee Period, totaling \$2,204.73. These expenses include, but are not limited to, reprographics services, court fees, and out-of-town travel expenses.

VALUATION OF SERVICES

8. As noted above, the amount of time spent by each Sidley attorney and paraprofessional providing services to the Committee during the Fee Period is set forth in the summary attached hereto as **Exhibit A**. The rates reflected on **Exhibit A** are Sidley's customary hourly rates for work of this character. The reasonable value of the services rendered by Sidley for the Fee Period as attorneys to the Committee in this Chapter 11 Case is \$495,680.50. Sidley has agreed to apply a 10% discount to its hourly fees in this Chapter 11 Case. Such discount has been applied to the fees Sidley incurred during the Fee Period, thereby reducing the total fees sought by Sidley pursuant to this Application to \$446,112.45.

9. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the fees requested are fair and reasonable given (a) the complexity of this Chapter 11 Case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

10. Although every effort has been made to include all fees and expenses incurred during the Fee Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Fee Period. Sidley reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Interim Compensation Procedures Order.

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WHEREFORE, Sidley requests (a) interim allowance and payment of compensation for professional services to the Committee during the Fee Period in the amount of \$446,112.45, representing 80% of the \$356,889.96 of fees incurred by Sidley for professional services to the Committee during the Fee Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by Sidley during the Fee Period in connection with such services in the amount of \$2,204.73, for a total interim award of \$359,094.69.

Dated: October 23, 2020

Respectfully submitted,

SIDLEY AUSTIN

/s/ Juliana L. Hoffman

Matthew A. Clemente (admitted *pro hac vice*)

Dennis M. Twomey (admitted *pro hac vice*)

Alyssa Russell (admitted *pro hac vice*)

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*Counsel For the Official Committee of
Unsecured Creditors*

CERTIFICATION OF MATTHEW A. CLEMENTE

Matthew A. Clemente, after being duly sworn according to law, deposes and says:

1. I am a partner of the applicant firm, Sidley Austin LLP (“Sidley”). I make this certification in accordance with *Appendix F of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas* (“Appendix F”) regarding the contents of applications for compensation and expenses.

2. I have read the *Eleventh Monthly Application of Sidley Austin LLP for Compensation and for Reimbursement of Expenses for the Period from September 1, 2020 through September 30, 2020* (the “Application”).

3. Pursuant to section I.G of Appendix F, I hereby certify to the best of my knowledge, information and belief, formed after reasonable inquiry, that (a) the compensation and expense reimbursement sought by Sidley is in conformity with Appendix F, except as specifically noted in the Application, and (b) the compensation and expense reimbursement requested by Sidley are billed at rates in accordance with practices no less favorable than those customarily employed by the applicant and generally accepted by the applicant’s clients.

4. I have reviewed the requirements of the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses by Attorneys in Large Chapter 11 Cases, effective November 1, 2013 (the “Guidelines”) and I believe that the Application complies with the Guidelines.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of October, 2020 at Chicago, Illinois.

/s/ Matthew A. Clemente
Matthew A. Clemente

CERTIFICATE OF SERVICE

I, Juliana L. Hoffman, hereby certify that on the 23rd day of October 2020, a true and correct copy of the foregoing *Eleventh Monthly Application of Sidley Austin LLP for Allowance of Compensation and Reimbursement of Expenses for the Period From September 1, 2020 to and Including September 30, 2020*, was sent via electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case.

/s/ Juliana L. Hoffman

Juliana L. Hoffman
SIDLEY AUSTIN LLP

*Counsel for the Official Committee
of Unsecured Creditors*

Exhibit A

Fees Statement

SIDLEY AUSTIN LLP

Invoice Number: 40061913
 Official Committee of Unsecured

Restructuring

T A S K D E T A I L

Date	Name	Narrative	Hours
02 Asset Disposition			
09/30/20	A Russell	Communicate with party re interest in estate assets.	.20
Task Subtotal			.20
05 Committee Meetings			
09/01/20	A Russell	Attend weekly Committee meeting.	.50
09/01/20	TM Grayeb	Take minutes for UCC weekly meeting.	.50
09/01/20	TM Grayeb	Revise and format past UCC weekly meeting minutes.	.80
09/01/20	PH Montgomery	Attend weekly UCC meeting	.50
09/01/20	MA Clemente	Participate in committee meeting	.60
09/01/20	EA Bromagen	Weekly meeting with Committee re various issues	.50
09/03/20	TM Grayeb	Revise and format past UCC weekly meeting minutes.	3.30
09/09/20	A Russell	Attend weekly Committee meeting.	.60
09/09/20	MA Clemente	Participate in committee meeting including continued call with members and team regarding same	1.00
09/09/20	DM Twomey	Weekly conference call with UCC/advisors regarding mediation, plan and other case issues	.60
09/09/20	AF O'Neill	Call with committee and with M. Clemente	1.00
09/09/20	PP Reid	Participate in UCC weekly call	.60
09/09/20	PH Montgomery	Weekly call with UCC regarding status of proceedings	.60
09/09/20	EA Bromagen	Call with Committee and professionals re various issues (.6); emails with M. Clemente and Committee re agenda for same (.1)	.70
09/14/20	MA Clemente	Detailed email with Committee re: various issues	.50
09/15/20	MA Clemente	Post mediation meeting with committee	.50
09/23/20	A Russell	Telephone conference with Sidley, FTI, and Committee re current case issues (1.1); review materials and Sidley and FTI team emails for same (.1)	1.20
09/23/20	MA Clemente	Call with the committee	1.10
09/23/20	EA Bromagen	Emails re agenda for Committee call (.3); call with Committee and professionals (1.1)	1.40
09/23/20	PP Reid	Participate in UCC call	1.10

SIDLEY AUSTIN LLP

Invoice Number: 40061913
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
09/23/20	PH Montgomery	Weekly call with UCC regarding case updates	1.10
09/23/20	CM Rognes	Attend UCC call	1.10
09/23/20	DM Twomey	Weekly conference call with UCC, advisors regarding case issues	1.10
09/23/20	AF O'Neill	Attend call with Committee regarding plan issues and next steps	1.10
09/30/20	A Russell	Attend weekly Committee meeting.	.50
09/30/20	MA Clemente	Call with the Committee and the board (.8); participate in committee meeting (.5)	1.30
09/30/20	EA Bromagen	Call with Committee and Board (.8); call with Committee and Committee professionals (.5)	1.30
09/30/20	DM Twomey	Weekly conference call with UCC, Board, advisors regarding case issues (.80); weekly conference call with UCC/advisors regarding case issues (.50)	1.30
09/30/20	AF O'Neill	Attend committee call with advisors regarding case issues	.50
09/30/20	PG Foley	Attend call with UCC, board, advisors regarding case issues (.8); attend weekly committee meeting regarding case issues (.5)	1.30
09/30/20	PH Montgomery	Attend board call with committee and advisors	.80
09/30/20	PH Montgomery	Call with committee regarding outstanding issues	.50
Task Subtotal			29.50
06 Business Operations			
09/03/20	MA Clemente	Call with J. Seery re: various issues	.50
09/14/20	MA Clemente	Analysis of updated distributable value from FTI	.40
09/17/20	MA Clemente	Analysis of Debtor plan presented during mediation (.6); confer with A. O'Neill regarding same (.3)	.90
09/22/20	MA Clemente	Participate in call with the Board	.50
09/22/20	EA Bromagen	Call with Board and Committee	.50
09/23/20	MA Clemente	Call with J. Seery re: various issues	.50
09/24/20	A Russell	Review, analyze proposed transaction under protocols (.3); correspond with Sidley and FTI teams re same (.2)	.50
09/24/20	MA Clemente	Analysis of SSPI notice and related email (.5); email with E. Bromagen re; SSPI (.1)	.60
09/24/20	EA Bromagen	Emails with M. Clemente and FTI re proposed transaction	.20
09/24/20	EA Bromagen	Analysis of proposed transaction issues including emails with	.50

SIDLEY AUSTIN LLP

Invoice Number: 40061913
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		FTI team and M. Clemente re same	
09/25/20	MA Clemente	Address issues regarding SSP transaction (.4); analysis of FTI responses (.3); emails with E. Bromagen re: SSP (.3)	1.00
09/25/20	EA Bromagen	Emails with FTI re proposed transaction issues	.30
09/29/20	A Russell	Review, analyze updates and analyses re proposed pending transaction.	.30
09/30/20	MA Clemente	Review SSP transaction materials (.4); call with J. Seery re: various issues (.3)	.70
Task Subtotal			7.40
07 Case Administration			
09/01/20	MA Clemente	Prepare for committee meeting (1.1); email with E. Bromagen re: committee call follow up (.1)	1.20
09/08/20	J Hoffman	Confer with H. Young re: case deadlines	.10
09/08/20	MA Clemente	Detailed email to FTI and Sidley team re: issues and committee call	.40
09/09/20	CM Rognes	Attend weekly pre-UCC call with Sidley and FTI	.40
09/09/20	A Russell	Telephone conference with Sidley and FTI teams to prepare for Committee meeting.	.50
09/09/20	MA Clemente	Team call with FTI (.5); prepare for committee meeting (1.5); call with J. Seery re: various issues (.5); analysis of committee issues regarding settlements (.6); email with E. Bromagen re: agenda (.1)	3.20
09/09/20	AF O'Neill	Review agenda for calls and consider status of trust agreement and next steps (.3); call with FTI prior to committee call (.5)	.80
09/09/20	EA Bromagen	Call with FTI and Sidley team pre weekly Committee call	.50
09/10/20	J Hoffman	Complete transcript request form	.20
09/10/20	MA Clemente	Emails with Pomerantz re: mediation schedule	.20
09/11/20	DJ Lutes	Review administrative tasks, status and next steps including excel report for invoices (.3); call with M. Byrne regarding same (.2)	.50
09/11/20	J Hoffman	Prepare second transcript request to accommodate clerk's timing	.10
09/11/20	MA Clemente	Review timing and scheduling of DS and plan confirmation	.30
09/13/20	J Hoffman	Correspondence with K. Rehling re: transcript payments (0.1); review transcript for accuracy (0.1)	.20
09/14/20	A Russell	Telephone conference with Sidley and FTI teams re current	.80

SIDLEY AUSTIN LLP

Invoice Number: 40061913
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
		case issues (in part)	
09/14/20	MA Clemente	Call with FTI team re: various issues (1.0); call with E. Bromagen re: various issues (.3)	1.30
09/14/20	EA Bromagen	Call with Sidley and FTI teams re various issues (1.0); call with M. Clemente re various issues (.3)	1.30
09/14/20	DM Twomey	Weekly conference call (in part) with FTI/Sidley team regarding case issues	.90
09/15/20	EA Bromagen	Call with G. Demo re various issues	.50
09/16/20	MA Clemente	Team call with FTI re: various issues (.5); prepare for team call (.3)	.80
09/16/20	EA Bromagen	Call with Sidley and FTI teams re various issues (.5); call with G Demo re various issues (0.1)	.60
09/17/20	J Hoffman	Draft schedule of matters to be heard (0.3); review pending timelines and motions (0.2)	.50
09/17/20	MA Clemente	Prepare for hearing (.8); call with E. Bromagen re: hearing (.1)	.90
09/18/20	EA Bromagen	Discuss various issues with G. Demo	.20
09/19/20	DJ Lutes	Research docket for monthly materials (.2); emails with J. Hoffman regarding status (.1); prepare electronic files for Sidley team (.2)	.50
09/20/20	MA Clemente	Email with E. Bromagen re: oversight board	.10
09/21/20	A Russell	Telephone conference with Sidley and FTI teams re current case issues.	.80
09/21/20	MA Clemente	Team call with FTI re: various issues (.8); review agenda for call (.1); emails with J. Pomerantz re: call with the board (.2)	1.10
09/21/20	EA Bromagen	Call with FTI and Sidley team re various issues (.8); emails with G. Demo re various issues (.3)	1.10
09/22/20	MA Clemente	Sidley team email re: update on plan issues (.2); call with D. Twomey re: strategy (.3)	.50
09/22/20	EA Bromagen	Emails with E. Cheng re filings (.2); emails with P. Montgomery re discovery issues (.1)	.30
09/23/20	DJ Lutes	Prepare interim fee application materials (.4); prepare electronic files from docket for Sidley team (.3); review order and update materials regarding same (.3)	1.00
09/23/20	CM Rognes	Draft meeting minutes	1.00
09/23/20	CM Rognes	Attend pre-UCC call (in part) with Sidley and FTI	.40
09/23/20	A Russell	Telephone conference with Sidley and FTI teams to prepare for Committee meeting.	.50

SIDLEY AUSTIN LLP

Invoice Number: 40061913
 Official Committee of Unsecured

Restructuring

Date	Name	Narrative	Hours
09/23/20	MA Clemente	Draft agenda for committee call (.5); prepare for committee call (1.0)	1.50
09/23/20	MA Clemente	Email with E. Bromagen re: plan (.1); call with FTI re: prepare for committee meeting (.5)	.60
09/23/20	EA Bromagen	Pre-UCC call with FTI and Sidley teams	.50
09/24/20	J Hoffman	Complete transcript request form (0.1); correspondence with service regarding same (0.1)	.20
09/24/20	MA Clemente	Call with E. Bromagen re: various issues	.30
09/24/20	EA Bromagen	Discuss various issues with M. Clemente	.30
09/25/20	A Russell	Draft internal work plan re plan and claim work streams (1.3); correspond with Sidley team re same (.2).	1.50
09/25/20	DM Twomey	Emails with team regarding workstreams, trust agreement, retained causes of action	.30
09/25/20	J Hoffman	Correspondence with court re: transcripts	.10
09/25/20	MA Clemente	Email to team regarding work streams	.30
09/27/20	EA Bromagen	Emails with Committee members and Pachulski re scheduling of Board meeting with Committee	.30
09/28/20	DJ Lutes	Review deadlines, timing and emails from Sidley team (.1); calendar deadlines and organize electronic files for Sidley team (.2)	.30
09/28/20	DM Twomey	Weekly call (in part) with FTI/Sidley regarding plan and other case issues	.30
09/28/20	A Russell	Telephone conference with Sidley and FTI teams re current case issues (.8); correspond with Sidley team re work plan (.3).	1.10
09/28/20	J Hoffman	Review docket for important case deadlines (0.1); correspondence with Sidley team re: same (0.1)	.20
09/28/20	MA Clemente	Team call with FTI re: various issues	.80
09/28/20	EA Bromagen	Call with Sidley and FTI teams re various issues	.80
09/29/20	EA Bromagen	Correspond with M. Clemente regarding various issues	.30
09/30/20	MA Clemente	Prepare for committee calls	1.00
Task Subtotal			34.40
08 Claims Administration and Objections			
09/01/20	A Russell	Review new claim objection filings.	.10
09/01/20	EA Bromagen	Draft email to FTI team re future workstreams re potential Debtor claims	.70

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Date	Name	Narrative	Hours
09/02/20	MA Clemente	Analysis of IFA claims (.4); analysis of composition of convenience class, structure and voting (.9); read FTI Hunter Mountain analysis (.8) prepare strategy regarding insider claims (.9)	3.00
09/02/20	EA Bromagen	Discuss analysis of potential claims with E. Cheng (.5); analyze and correspond same with M. Clemente (.2); consider same analysis and emails with E. Cheng re same (.6)	1.30
09/03/20	MA Clemente	Review updated claims chart (.3); analysis of claim objection strategy (.9); analysis of Hunter Mountain issues (.9)	2.10
09/03/20	EA Bromagen	Analysis of potential claims with C. Tully, M. Clemente, and E. Cheng (.8); review of same (.5)	1.30
09/04/20	MA Clemente	Analysis of Daugherty claims and related objection (.5); analysis of tax arguments on other claims (.9)	1.40
09/08/20	MA Clemente	Analysis of claim objection/filed claim reconciliation (.4); assess strategies for insider claims (.6); analysis of information from P. Daugherty (.5)	1.50
09/09/20	MA Clemente	Review Acis settlement	.50
09/09/20	DM Twomey	Analyze internal emails regarding Acis claim settlement (.20); correspond with M. Clemente regarding same, related mediation issues (.10)	.30
09/09/20	EA Bromagen	Review draft claim settlement for Acis claims	.30
09/11/20	A Russell	Review, analyze Harbour response to claim objection.	.30
09/14/20	MA Clemente	Analysis of emails from P. Daugherty re: Harborvest (.4); analysis of Harborvest materials (.9)	1.30
09/14/20	EA Bromagen	Emails with FTI and Sidley teams re Harbourvest claims (.2); review of Harbourvest reply to objection (.9)	1.10
09/15/20	MA Clemente	Analysis of FTI distributable value (.5); call with FTI re: distributable value analysis (.3)	.80
09/15/20	EA Bromagen	Review of Harbourvest reply (.4) ; emails with Sidley and FTI team re same (.2); emails with M. Clemente re same (.3); review of claims detail and analyze classification (1.5)	2.40
09/16/20	MA Clemente	Analysis of Harborvest claim	3.00
09/16/20	EA Bromagen	Review supporting documentation for Harbourvest claims (.5); email to M. Clemente re same (.1)	.60
09/17/20	MA Clemente	Analysis of HarborVest materials	1.10
09/18/20	MA Clemente	Analysis of Harborvest issues	1.10
09/21/20	EA Bromagen	Further review of Harbourvest claims and email to Sidley team re same	.60

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Date	Name	Narrative	Hours
09/22/20	MA Clemente	Analysis of Harborvest (.8); review claims waterfall (.3)	1.10
09/23/20	MA Clemente	Study claim reallocation from FTI (.4); responsive email to FTI (.1)	.50
09/25/20	A Russell	Correspond with Sidley team re HarbourVest claim.	.20
09/25/20	MA Clemente	Review 9019 papers	1.10
09/28/20	MA Clemente	Analysis of HarborVest claims and strategy	1.00
09/28/20	EA Bromagen	Discuss claims analysis and convenience class treatment with E. Cheng	.30
09/29/20	A Russell	Correspond with Sidley and FTI teams re claim analyses.	.40
09/29/20	EA Bromagen	Discuss Harbourvest claim with G. Demo (.3); review harbourvest documents and email summary of Debtor position to Sidley team (.5); review of FTI claims analysis and emails with Sidley team and E. Cheng re same (.4)	1.20
09/30/20	MA Clemente	Analysis of FTI proposals on convenience class (.5); call with E. Bromagen re: FTI analysis (.4)	.90
09/30/20	EA Bromagen	Review and comment on claims analysis (.6); call with M. Clemente regarding same (.4); emails and discussions with E. Cheng re same (0.5)	1.50

Task Subtotal 33.00

09 Corporate Governance and Board Matters

09/18/20	MA Clemente	Email with J. Pomerantz re: call with the board	.10
09/30/20	A Russell	Telephone conference with Sidley, FTI, Pachulski, DSI, Committee and Independent Directors re weekly Board updates (.8); review materials for same (.1)	.90

Task Subtotal 1.00

12 Fee Applications

09/01/20	DJ Lutes	Review August monthly materials and incoming Committee emails for status, timing and background	.30
09/01/20	J Hoffman	Draft and file CNO for fee application	.30
09/02/20	DJ Lutes	Prepare monthly fee statement materials and exhibits including review for compliance regarding same	1.70
09/03/20	DJ Lutes	Prepare monthly fee application materials and exhibits (1.1); prepare interim fee application materials and spreadsheets (2.1); review incoming emails from Sidley team regarding pending items (.2)	3.40
09/04/20	DJ Lutes	Review monthly fee application materials for compliance (1.7); prepare interim fee application materials and spreadsheets (.3);	2.30

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Date	Name	Narrative	Hours
		update electronic materials for Sidley team (.2); emails with M. Byrne regarding same (.1)	
09/08/20	DJ Lutes	Prepare monthly fee application exhibits and materials including review for compliance (6.7); emails with M. Byrne regarding same (.1)	6.80
09/09/20	DJ Lutes	Prepare monthly fee application exhibits and materials including review for compliance (4.2); emails with M. Byrne regarding same (.1); emails to B. Guzina regarding materials, status and next steps (.1)	4.40
09/09/20	J Hoffman	Review, revise FTI monthly fee application (0.1); correspondence with FTI, Committee re: same (0.1); finalize and upload interim fee app order (0.4)	.60
09/09/20	MA Clemente	Review team emails regarding interim fee apps	.20
09/10/20	DJ Lutes	Emails and call with M. Byrne regarding monthly fee application issues (.3); emails with P. Foley regarding privilege review (.2); prepare monthly materials for same (.3); call with B. Guzina regarding status (.1); prepare electronic files for Sidley team (.1); emails with J. Hoffman regarding CNO materials and updates (.1)	1.10
09/10/20	J Hoffman	Draft order for FTI Interim Fee application (0.3); review and upload order (0.1); draft and file CNO (0.2)	.60
09/11/20	J Hoffman	Finalize and file FTI monthly fee application	.30
09/14/20	J Hoffman	Review pleadings in response to Court's inquiry re: fee applications (0.1); correspondence with Court re: fee application orders (0.1)	.20
09/15/20	DJ Lutes	Email with P. Foley regarding privilege review (.1); email with B. Guzina regarding status and deadlines (.1); review materials for same (.1)	.30
09/16/20	DJ Lutes	Prepare fee statement exhibit (.3); revise August monthly fee application materials, declaration and exhibits (.5); emails with Sidley team regarding updates and timing (.3); emails with S. Caputo regarding same (.3)	1.40
09/17/20	DJ Lutes	Emails with Sidley team regarding August monthly fee statement status (.1); emails with M. Clemente regarding same (.1); review materials for same (.1)	.30
09/17/20	J Hoffman	Correspondence with M. Clemente, Committee re: 10th monthly fee application	.10
09/17/20	MA Clemente	Review fee application, related certification and emails with Sidley team regarding same	.50
09/18/20	DJ Lutes	Call with B. Guzina regarding monthly materials and deadlines (.2); emails with S. Caputo regarding ledex materials, monthly	.90

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Date	Name	Narrative	Hours
		materials, tasks and deadlines (.3); prepare electronic materials for Sidley team regarding same (.4)	
09/19/20	J Hoffman	Finalize and file monthly fee statement	.20
09/21/20	DJ Lutes	Emails with S. Caputo regarding monthly fee application materials and tasks (.3); assess interim fee application tasks (.1)	.40
09/22/20	DJ Lutes	Prepare interim fee application spreadsheet and 3rd interim fee application materials for same	1.80
09/24/20	DJ Lutes	Prepare 3rd interim fee application, exhibits, proposed order and declaration (1.7); call with J. Hoffman regarding order (.1); research electronic files for deadlines and status (.3)	2.10
09/25/20	DJ Lutes	Prepare 3rd interim fee application materials	.40
09/29/20	DJ Lutes	Prepare monthly fee application and exhibits (1.0); prepare interim fee application materials including review of tasks and deadlines (.8); emails with S. Caputo regarding same (.1)	1.90
09/30/20	DJ Lutes	Prepare monthly fee application and exhibits including bio research and reconciliation (2.9); prepare interim fee application materials including review of tasks and deadlines (.4); call and emails with S. Caputo regarding same (.3)	3.60
Task Subtotal			36.10
14 Litigation			
09/01/20	CM Rognes	Research re: prior complaints and transcripts	.30
09/01/20	PP Reid	Participate in UCC call regarding suspicious transactions and liquidation trustee options	.50
09/01/20	DM Twomey	Conference call with UCC/advisors regarding mediation, case issues (.50); emails with mediators, UCC regarding mediation (.10)	.60
09/01/20	MA Clemente	Analysis of CLOH strategy and timing (1.1); prepare for next mediation session (.6)	1.70
09/01/20	EA Bromagen	Emails with Latham and Sidley team re unredacted documents (.3); emails with UCC re mediation sessions (.2)	.50
09/02/20	TM Grayeb	CourtCall invoice review and processing.	.10
09/02/20	CM Rognes	Summarize status of ESI protocols (0.3); research re: prior complaints and transcripts (0.5); correspond with P. Montgomery and P. Foley re: ESI status (0.7); correspond with CLO Holdco re: search terms (0.1); draft correspondence re: third party neutral (0.1)	1.70
09/02/20	PH Montgomery	Call with C. Rognes and P. Foley regarding e-discovery issues	.70
09/02/20	D Griffith	Perform docket research in multiple precedent cases for C.	1.30

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Date	Name	Narrative	Hours
		Rognes	
09/02/20	PG Foley	Call with P. Montgomery and C. Rognes regarding ESI status (.7); prepare related correspondence to Sidley team regarding same (.3); analyze materials and issues for same (.8)	1.80
09/02/20	MA Clemente	Address emails re: third party neutral (.3); follow up on issues raised by Acis regarding Dondero claims (.9)	1.20
09/02/20	EA Bromagen	Emails with FTI and K. Posin re diligence materials received from the Debtor (.2); emails with C. Rognes re files from prior Highland litigation and review of same (1.1) ; email to Committee re mediation scheduling (.1)	1.40
09/03/20	CM Rognes	Revise ESI protocol (0.9); revise CLO Holdco search terms (0.2); review transcript re: insolvency (0.1)	1.20
09/03/20	PH Montgomery	Communications with J. Morris regarding privilege terms (.2); communications with T. Stratford regarding document review (.2); review and revise draft ESI protocol (.7); communications with M. Clemente regarding mediation (.1); communications with J. Kane regarding search terms (.5)	1.70
09/03/20	D Griffith	Ascertained the availability of the requested case filing for C. Rognes	1.50
09/03/20	PG Foley	Correspondence regarding draft ESI protocol	.20
09/03/20	MA Clemente	Call with FTI re: AUM, fees and related issues (.9); review FTI materials on AUM, fees and related issues (.3); participate in mediation session (.5); prepare for mediation session (.5); emails with P. Montgomery re: discovery (.3); analysis of Dondero claims (1.1)	3.60
09/03/20	EA Bromagen	Emails to C. Rognes re filings from prior Highland related litigation (.2); review of same (1.4)	1.60
09/03/20	EA Bromagen	Prepare for and attend mediation session (.6); review and revise draft objection to exclusivity and emails with Sidley team and Committee re same (.8); emails with M. Clemente re claims objections and related issues (.6)	2.00
09/04/20	CM Rognes	Draft agenda re: ESI status call (0.3); confer with P. Montgomery and Debtor's counsel re: status of ESI discovery and privilege terms (0.3); correspond with various objectors re: ESI protocol (0.5); revise ESI protocol (0.1); correspond with P. Montgomery re: ESI protocol (0.1)	1.30
09/04/20	J Hoffman	Review, revise objection to exclusivity (0.1); finalize and file objection (0.2)	.30
09/04/20	DM Twomey	Phone conference with M. Clemente regarding mediation update, related strategy and next steps	.60

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Date	Name	Narrative	Hours
09/04/20	PH Montgomery	Call with J. Morris, C. Rognes and P. Foley regarding ESI protocol (.3); call with C. Rognes regarding same (.2)	.50
09/04/20	PG Foley	Correspondence with Sidley team regarding discovery issues and related search terms	.40
09/04/20	MA Clemente	Call with the mediators (.5); analysis of mediation proposal and strategy with D. Twomey (.6); review FTI revised litigation analysis (0.7)	1.80
09/04/20	EA Bromagen	Finalize objection and emails with J. Hoffman re filing of same (.3); review prior Debtor related litigation filings and email to M. Clemente re same (.5)	.80
09/08/20	CM Rognes	Revise objector search terms	.30
09/08/20	PP Reid	Emails and telephone conferences with Sidley team regarding potential neutral	.50
09/08/20	PH Montgomery	Call with J. Morris re ediscovery issues (.1); communications with the committee regarding third party neutral (.1); communications with J. Morris regarding ediscovery issues (.1); communications with objectors regarding revisions to protocol (.2)	.50
09/08/20	MA Clemente	Address discovery related issues (.4); analysis of CLOH status and strategy (.5)	.90
09/09/20	CM Rognes	Revise ESI protocol (0.6); correspond with Meta-E and P. Montgomery re: discovery costs (0.4); correspond with objector counsel, P. Montgomery, and P. Foley re: ESI protocol (0.2); correspond with P. Montgomery re: ESI protocol (0.1); review privilege log categories (0.3)	1.60
09/09/20	PP Reid	Participate in professional call regarding mediation plan, liquidation trustee (.5); emails with team regarding hearing and review materials for same (.4)	.90
09/09/20	DM Twomey	Analysis regarding status update, claims and mediation issues	.60
09/09/20	PH Montgomery	Call with FTI regarding status and workflow (.5); call regarding discovery costs with Meta-E (.4); call with objectors regarding discovery issues (.2); correspond with C. Rognes regarding protocol (.1); correspond with P. Foley and C. Rognes regarding discovery terms regarding CLO Holdco (.2); communications with B. Clark and J. Kane regarding same (.1); communications with M. Clemente regarding document review protocol (.1); communications with P. Foley and C. Rognes regarding privilege log fields for communications with objectors (0.2)	1.80
09/09/20	MA Clemente	Address email from P. Montgomery re: discovery (.2); address issues for further mediation session (.3)	.50

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Date	Name	Narrative	Hours
09/09/20	PG Foley	Attend UCC professionals call (.5); correspondence with Sidley team regarding discovery, search terms (.5); review discovery materials regarding same (.4)	1.40
09/10/20	CM Rognes	Review, summarize production from CLO Holdco	.90
09/10/20	PH Montgomery	Attend omnibus hearing regarding various topics (1.5); call with M. Clemente regarding same (.2)	1.70
09/10/20	J Hoffman	Attend hearing in part	.30
09/10/20	MA Clemente	Participate in hearing (1.5); prepare for hearing (1.3); email from mediators re: mediation (.1)	2.90
09/10/20	PG Foley	Correspondence with team regarding productions, other discovery issues including review of materials regarding same	1.40
09/10/20	EA Bromagen	Attend and participate at hearing	1.50
09/11/20	PH Montgomery	Communications with P. Foley regarding CLO Holdco documents and related issues (.1); communications with P. McVoy regarding document review protocol application (.1); call with CLO Holdco regarding search terms and related issues (.3)	.50
09/11/20	MA Clemente	Call with CLOH re: discovery (.4); email with P. Montgomery re: litigation (.2); analysis of strategy for further mediation session (.9)	1.50
09/11/20	PG Foley	Call with counsel for CLO Holdco regarding discovery (.4); related correspondence with counsel and Sidley team regarding same (.5); analyze discovery issues regarding the same (.5)	1.40
09/12/20	MA Clemente	Prepare for session with mediator	1.00
09/13/20	A Russell	Telephone conference with Sidley and JPM teams re allocation dispute evidentiary issues including related post-call correspondence.	1.30
09/13/20	MA Clemente	Prepare for call with mediators	.50
09/14/20	PH Montgomery	Call with FTI regarding status and work flows	1.00
09/14/20	MA Clemente	Call with the mediators (1.0); prepare for mediator call (.5)	1.50
09/14/20	PH Montgomery	Review and revise memos including communications with C. Rognes regarding same	4.60
09/14/20	PP Reid	Participate in update and mediation prep call with FTI (in part)	.50
09/14/20	PH Montgomery	Communications with C. Rognes and E. Cheng regarding CLO Holdco discovery issues (.2); communications with B. Clark regarding same (.2); communications with C. Rognes regarding discovery protocol (.1); communications with J. Wright regarding same (.2); communications with P. McVoy regarding	.90

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Date	Name	Narrative	Hours
		privilege log (.2)	
09/14/20	CM Rognes	Attend weekly professionals call with Sidley and FTI (in part)	.90
09/14/20	PG Foley	UCC professionals call, related correspondence re discovery	1.50
09/15/20	PP Reid	Participate in portion of mediation sessions (2.1); participate (in part) in UCC mediation room regarding Dondero proposal (.3); call with P. Montgomery regarding settlement (.2)	2.60
09/15/20	PH Montgomery	Attend mediation proceedings (3.5); communications with J. Morris regarding privilege issues (.2); communications with P. McVoy regarding ediscovery protocol (.3); communications with B. Clark regarding CLO Holdco data (.2); call with P. Reid regarding settlement issues (.2)	4.40
09/15/20	MA Clemente	Participate in mediations session with the mediators (1.5); discussion with mediators (.5); mediation discussion with mediators (.7); prepare for mediation (1.5); further discussion with the mediators and committee (.5); follow on discussion with mediators (.5); analysis of strategy based on mediation (.5); correspond with D. Twomey regarding same (.3); correspond with A. O'Neill regarding same (.3)	6.30
09/15/20	CM Rognes	Review disputed and undisputed privilege terms	.40
09/15/20	DM Twomey	Review emails regarding mediation (.10); correspond with M. Clemente regarding mediation update, plan issues, next steps (.30)	.40
09/15/20	EA Bromagen	Prepare for and attend multiple mediation sessions	5.10
09/16/20	CM Rognes	Review shared services agreements	.10
09/16/20	PH Montgomery	Call with FTI and Sidley regarding workstreams (.5); communications with P. McVoy, J. Morris and J. Kane regarding discovery issues (.8); review shared service agreement and communications regarding same with Sidley team (.8); review Dondero offer and communications regarding same (.2)	2.30
09/16/20	PP Reid	Emails with Sidley team regarding share-services issues	.30
09/16/20	PG Foley	Attend UCC professionals call in part relating to workstreams	.40
09/16/20	PG Foley	Review of and revisions to fee application for privilege	3.60
09/16/20	MA Clemente	Emails with P. Montgomery re: CLO Holdco discovery	.20
09/17/20	CM Rognes	Correspond with P. Montgomery and debtor counsel re: ESI status (0.4); review shared services agreements (0.1); review privilege terms (1.0); correspond with P. Montgomery re: ESI status (0.4)	1.90
09/17/20	PP Reid	Participate in status conference with J. Jernigan regarding	.40

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Date	Name	Narrative	Hours
		exclusivity and objections	
09/17/20	PG Foley	Call with P. McVoy regarding document processing (.3); review issues, related instruction and prepare materials for same (3.5); correspondence with Sidley team regarding same (.3)	4.10
09/17/20	PH Montgomery	Attend hearing (.4); call with C. Rognes and J. Morris regarding ESI (.4); call with C. Rognes regarding discovery issues (.4); call with P. Foley and P. McVoy regarding discovery issues (.3); correspond with P. Foley regarding discovery (.1); communications with J. Morris re e-discovery (.1); communications with J. Kane regarding extension (.1); review updated discovery term protocol including communications with J. Morris regarding same (3.7)	5.50
09/17/20	J Hoffman	Prepare for and attend hearing (0.3); correspondence with E. Bromagen, C. Rognes re: procedure for expedited motion (0.1)	.40
09/17/20	MA Clemente	Participate in hearing (.4); analysis of CLOH re: discovery and strategy (.8)	1.20
09/17/20	EA Bromagen	Attend hearing by phone (.4); correspond with M. Clemente regarding same (.1); review CLOH discovery status (.4)	.90
09/18/20	CM Rognes	Review privilege terms	.40
09/18/20	PG Foley	Correspondence with Sidley team regarding discovery, data processing, and review access (1.5); review materials regarding same (1.1)	2.60
09/18/20	PH Montgomery	Review and revise directions for document processing (.3); correspondence with P. Foley regarding same (.3); communications with C. Rognes regarding review protocol (.2); communications with objectors regarding their data review (.4); communications with P. McVoy regarding document review (.1); communications with P. McVoy regarding review database (.1)	1.40
09/21/20	CM Rognes	Attend weekly professionals call with Sidley and FTI (0.8); correspond with P. Montgomery and Debtor counsel re: ESI status and privilege terms (0.4); research re: attorney client privilege (0.8); correspond with P. Montgomery re: privilege terms and ESI production (0.5); review relevant documents (0.2)	2.70
09/21/20	PH Montgomery	Review of documents related to HCLOF issues (7.5); call with FTI regarding work streams (.8); calls with C. Rognes regarding discovery issues (.5); call with C. Rognes and J. Morris regarding same (.4)	9.20
09/21/20	MA Clemente	Address CLOH timing issues (.3); emails from P. Montgomery re: discovery (.3); further analysis of Harborvest materials (.9)	1.50

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Date	Name	Narrative	Hours
09/21/20	PP Reid	Participate in professionals call with FTI (.8); emails with Sidley team regarding documents produced by Debtor (.2)	1.00
09/21/20	PG Foley	Attend UCC professionals call (in part) including review of related FTI correspondence	.60
09/22/20	CM Rognes	Review local rules re: deadline extensions (0.1); research re: extension of deadline (0.6); correspond with J. Hoffman re: motion to extend deadline (0.1); draft motion to extend deadline (1.1); correspond with FTI re: litigation theories (0.1)	2.00
09/22/20	PH Montgomery	Attend Board call (.5); communications with J. Kane regarding extension of deadline (.2); communications with J. Morris regarding discovery issues (.1); correspondence with P. Foley and C. Rognes regarding motion to extend (.1); communications with M. Clemente, E. Bromagen, P. Foley and C. Rognes regarding document review (.4); review of documents related to HCLOF/Harbourvest (2.3)	3.60
09/22/20	J Hoffman	Research precedent for 9006 extension motion (0.2); correspondence with C Rognes re: same (0.1)	.30
09/22/20	MA Clemente	Call to the mediators (.1); call with the mediators (.4); analysis of potential responses to proposal (.7)	1.20
09/22/20	PG Foley	Review materials and correspondence with Sidley team regarding investigation of potential CLO Holdco claims, related extension of time	.40
09/23/20	CM Rognes	Draft motion for extension (1.8); review document production (0.1); research re: privilege (0.3)	2.20
09/23/20	PH Montgomery	Call with FTI regarding issues for discussion with UCC (.5); communications with P. Reid re Harbourvest claim (.1); communications with P. Reid and P. Foley regarding shared services (.1); communications with P. McVoy regarding document review (.1); communications with P. Foley and C. Rognes regarding objector issues (.1); communications with J. Kane regarding extension (.1); communications with M. Clemente and E. Bromagen regarding same (.1); review of documents related to proofs of claim and analysis (2.0); review of transcript and correspondence regarding same (.2)	3.30
09/23/20	PP Reid	Review Harbourvest claim (.9); emails with Sidley team regarding same (.2); participate in professionals' call (.5)	1.60
09/23/20	PG Foley	Attend UCC professionals call (.5); production review and research regarding potential Harbourvest claims; related correspondence (2.6)	3.10
09/24/20	CM Rognes	Review, revise ESI protocol (0.4); draft motion for extension (0.5); review hit counts re: privilege terms (0.3); correspond with P. Montgomery and P. Foley re: hit counts (0.2)	1.40

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Date	Name	Narrative	Hours
09/24/20	PP Reid	Review Harbourvest documents	.60
09/24/20	PH Montgomery	Communications with C. Rognes regarding search term revisions (.4); communications with A. Magazine (Meta-E) regarding same (.2)	.60
09/24/20	PG Foley	Production review and research regarding potential HarbourVest claims, related correspondence	2.10
09/25/20	CM Rognes	Revise motion for extension (0.1); correspond with P. Foley and P. Montgomery re: motion for extension (0.1)	.20
09/25/20	PP Reid	Review Harbourvest materials (.6); emails with P. Foley and P. Montgomery regarding same (.2); emails with Sidley team regarding CLOH claims (.2)	1.00
09/25/20	PH Montgomery	Communications with C. Homsher and L. Chowdhury regarding judicial research and related issues	.10
09/25/20	PH Montgomery	Communications with P. Foley and P. Reid regarding HarbourVest claims (.2); communications with M. Clemente regarding CLO Holdco extension (.3)	.50
09/25/20	PG Foley	Production review and research regarding potential HarbourVest claims, related correspondence (5.4); emails with P. Reid and P. Montgomery regarding same (.2); correspondence regarding investigation of potential CLO Holdco claims, draft motion for extension of time (.6)	6.20
09/25/20	MA Clemente	Address CLOH issues	.30
09/26/20	PH Montgomery	Communications with P. Foley, M. Clemente, C. Rognes and P. Reid regarding extensions and other issues	.40
09/28/20	NP Cade	Prepare chart distinguishing outside law firms and vendors for ediscovery vendor (3.1); correspond with C. Rognes regarding same (.1)	3.20
09/28/20	CM Rognes	Attend weekly professional call with Sidley and FTI (in part) (0.3); review privilege terms (1.1); correspond with Meta-E and P. Montgomery re: search terms (0.3); correspond with P. Montgomery re: search terms (0.1); correspond with N. Cade regarding same (0.1)	1.90
09/28/20	PP Reid	Review research on HarbourVest (.4); participate in call with FTI (.8); emails with P. Foley and Sidley team regarding research of HarbourVest claims (.6)	1.80
09/28/20	PH Montgomery	Call with FTI regarding status of workflows (.8); call with Meta-E regarding search protocol (.3); call with C. Rognes re same (.1); draft protocol work flow for use by Meta-E (.5); communications with Meta-E regarding protocol (.1); communications with J. Kane regarding extensions (.1); communications with J. Morris regarding document production	5.20

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Restructuring

Date	Name	Narrative	Hours
		(.2); review of produced documents related to HCLOF (3.1)	
09/28/20	PG Foley	Participate in UCC professionals call (.8); related correspondence with professionals regarding same (.1); prepare talking points regarding potential HarbourVest claims (.9); research for same (.9); correspondence with P. Reid and Sidley team regarding same (.6)	3.30
09/28/20	MA Clemente	Prepare strategy for response to mediator	1.10
09/29/20	PP Reid	Review research on HarbourVest (.8); emails regarding same (.2)	1.00
09/29/20	PG Foley	Review of production materials, research regarding HarbourVest claims and related talking points (1.7); revisions to talking points (.5)	2.20
09/29/20	PH Montgomery	Review of HCLOF documents	3.20
09/30/20	PP Reid	Review and revise research on HarbourVest (1.2); emails with Sidley team regarding same (.3); review and revise motion for extension on Holdco claims (.2); correspond with P. Foley and Sidley team regarding same (.3)	2.00
09/30/20	PG Foley	Revisions to motion for CLO Holdco deadline extension, ancillary documents (1.8); related internal correspondence for same (.6)	2.40
09/30/20	CM Rognes	Review search terms (0.1); draft motion for extension (1.2); draft motion for expedited hearing (0.9); correspond with P. Montgomery re: motion for extension (0.1)	2.30
09/30/20	PH Montgomery	Correspond with P. Foley regarding claim research (.1); calls with prospective trustee candidates (1.5); correspond with M. Clemente regarding extension issues (.3); correspond with P. Reid re same (.2); correspond with C. Rognes regarding same (.1); communications with J. Kane, J. Morris C. Rognes, meta-E, P. Foley regarding discovery issues (1.3); review and revise motion for extension and motion to expedite (1.2)	4.70
09/30/20	MA Clemente	Email with P. Montgomery re: CLOH (.1); call with P. Montgomery re: discovery (.3)	.40
Task Subtotal			189.80
15 Plan and Disclosure Statement			
09/01/20	A Russell	Correspond with A. O'Neill re claimant trust agreement.	.20
09/01/20	AF O'Neill	Communications with M. Clemente regarding next steps with Trust agreement (.2); and with committee members about potential trust candidates (.2); draft questions to Alyssa regarding litigation trust and consider need for same and timing issues (.5); comment on claimant trust agreement (3.5)	4.40

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Date	Name	Narrative	Hours
09/01/20	MA Clemente	Email with D. Twomey re: exclusivity objection (.1); preliminary review of creditor trust agreement draft (.5); analysis of duties of trustee and oversight board (.7)	1.30
09/01/20	EA Bromagen	Review and revise draft objection to exclusivity extension and emails with team re same	1.50
09/01/20	DM Twomey	Review and provide comments to draft exclusivity objection (.80); emails with E. Bromagen, M. Clemente regarding same (.20).	1.00
09/02/20	A Russell	Review, analyze comments re trust agreement.	.30
09/02/20	AF O'Neill	Analyze trust agreement and related matters (1.3); continue to prepare mark-up of same (1.8); communications with team regarding same (.4)	3.50
09/02/20	DM Twomey	Emails with M. Clemente, E. Bromagen regarding exclusivity objection (.20); emails regarding mediation update (.10)	.30
09/02/20	MA Clemente	Review initial AFO comments to trust agreement (.4); analysis of timing and mediation issues (.3)	.70
09/02/20	EA Bromagen	Review and email to Committee draft of objection to exclusivity	.30
09/03/20	DM Twomey	Review revised exclusivity objection (.20); emails with M. Clemente, E. Bromagen regarding same, related comments (.20)	.40
09/03/20	A Russell	Review Committee objection to exclusivity and correspondence re same.	.30
09/03/20	AF O'Neill	Communications with Sidley team regarding next steps on plan issues	.30
09/03/20	MA Clemente	Prepare exclusivity objection (1.1); email with D. Twomey and E. Bromagen re: exclusivity objection (.3)	1.40
09/04/20	AF O'Neill	Multiple communications with Sidley team regarding: next steps and prepare for call on claimant trust and plan issues (1.0); call with team regarding same (1.0); multiple follow-up tasks regarding exclusivity and review revised and final papers (.8)	2.80
09/04/20	A Russell	Telephone conference with Sidley team re open plan issues and strategy re same (1.0); correspond with Sidley team regarding same (.2)	1.20
09/04/20	MA Clemente	Call with Sidley team re: plan issues (1.0); analysis of timing and exclusivity and voting (1.1)	2.10
09/04/20	EA Bromagen	Research Plan issues	2.20
09/04/20	EA Bromagen	Call with M. Clemente, A. Russell and A. O'Neill re various	1.00

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Date	Name	Narrative	Hours
		workstreams	
09/08/20	AF O'Neill	Analyze mediation progress and game plan regarding same (.5); communications with team regarding trust agreement (.2); multiple communications regarding trust documents and reorg. Debtor constituent documents and timing issues regarding same (.4); review M. Clemente analysis regarding: post-petition interest and analysis regarding same, consider E. Bromagen memo regarding same (.8); respond to A. Russell regarding trust agreement questions (.2)	2.10
09/08/20	A Russell	Research re plan issue (.7); correspond with Sidley team re same (.3); draft, revise claimant trust agreement (1.8); review, analyze comments re same (1.3).	4.10
09/08/20	MA Clemente	Email to Sidley team re: plan issues (.3); review org documents for reorganized debtor (.4); analysis of open plan issues including structure and amount for convenience class (1.3); work on potential resolution structures (.9); assess potential candidates for board and other roles (.5)	3.40
09/08/20	EA Bromagen	Research plan related issue and draft summary for Sidley team	3.10
09/09/20	AF O'Neill	Review communications with FTI regarding claims analysis and mediation issues and consider same (.3); correspond with M. Clemente regarding claims settlement/committee issues and consider same (.4); multiple communications with team regarding trust issues and reorganized debtor documents and next steps (.3); analyze same and exclusivity extension and mediation issues (.7)	1.70
09/09/20	A Russell	Revise claimant trust agreement (2.6); review, analyze comments and correspondence re same (.7).	3.30
09/09/20	MA Clemente	Call with J. Pomerantz re: plan and exclusivity (.4); emails with A. Russell re: org documents (.3); review revised draft of claimant trust agreement (.5)	1.20
09/09/20	EA Bromagen	Emails with Sidley team re plan documents	.30
09/10/20	A Russell	Correspond with Sidley team re comments to trust agreement (.4); correspond with same re updates re exclusivity, summary of hearing re same (.5).	.90
09/10/20	AF O'Neill	Review revised trust agreement including multiple internal communications regarding same (1.3); review M. Clemente comments on same and consider issues (.4); prepare for call on same (0.3)Review revised trust agreement including multiple internal communications regarding same (1.3); review M. Clemente comments on same and consider issues (.4); prepare for call on same (0.3)	2.00
09/10/20	MA Clemente	Address plan issues for mediation (.7); emails with A. Russell	2.40

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Date	Name	Narrative	Hours
		re: plan documents (.3); email to internal team re: plan issues and process forward (.3); review revised trust agreement (.4); analysis of transferability issues (.7)	
09/10/20	EA Bromagen	Emails with Sidley team re plan documents and issues (.3); analysis of plan issues (1.8)	2.10
09/11/20	A Russell	Telephone conference with Sidley team re trust agreement (1.0); revise same and circulate to Committee (1.1); telephone conference with G. Demo and E. Bromagen re open plan issues (.5); prepare for and follow up re same (.3); revise plan issues list for mediation (.5).	3.40
09/11/20	AF O'Neill	Review plan comments, issues and analysis regarding same	1.00
09/11/20	SM Saddleton	Review agreements of new GP entities	1.00
09/11/20	MA Clemente	Call with E. Bromagen and A. Russell re: plan issues (1.0); review revised creditor trust agreement (.5); call with J. Pomerantz re: plan issues (.5); call with E. Bromagen re: plan issues (.4); analysis of potential structure changes for convenience class (.6); analysis of releases, interest and other open plan issues (1.0)	4.00
09/11/20	EA Bromagen	Call with M. Clemente and A. Russell re plan issues and plan documents (1.0); emails with Sidley team re same (.3); discuss plan issues with G. Demo and A. Russell (.5); call with E. Cheng re interest issue (.4); call with M. Clemente re plan issues (.4); analysis of plan issues and research related to same (2.1); draft email summary of interest issue to M. Clemente (.4)	5.10
09/12/20	MA Clemente	Emails with E. Bromagen re: oversight board candidates (.3); review process for board appointment (.3); review provisions of creditor trust agreement (.5)	1.10
09/12/20	EA Bromagen	Organize proposed candidates for post effective date roles and emails with M. Clemente and FTI team re same (.5); review of interest plan issue research (1.3); emails with M. Clemente re same (.2)	2.00
09/13/20	AF O'Neill	Correspond with Sidley team regarding plan next steps and consider same	.50
09/14/20	A Russell	Correspond with Sidley team re plan issues to prepare for mediation (.8); review, analyze comments to trust agreement (.3); revise trust agreement (1.5); correspond with Sidley team re same (.2); review updates re mediation sessions re plan (.3).	3.10
09/14/20	MA Clemente	Assess open plan issues (.8); analysis of strategies/scenarios for interest on trust interests (.8)	1.60
09/14/20	M Abdul-Jabbar	Analyze litigation strategy regarding upcoming mediation, plan issues and pending discovery requests for Hunter Mountain and	.70

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Restructuring

Date	Name	Narrative	Hours
		CLO Holdco	
09/14/20	DM Twomey	Emails with FTI/Sidley teams regarding plan issues, distributable value and claims issues	.30
09/14/20	AF O'Neill	Review plan update email and analysis regarding next steps (.4); review new language for trust agreement (.3); comment on same (.5); follow-up communications with Sidley team regarding same (0.2)	1.40
09/14/20	EA Bromagen	Review of updated FTI value analysis	.90
09/15/20	AF O'Neill	Analyze plan issues regarding claims objections and review pleadings regarding same (1.5); review issues on claims trust and correspond with A. Russell regarding same (.3); correspond with M. Clemente regarding mediation and next steps with same and related plan strategy (.3)	2.10
09/15/20	A Russell	Prepare for and participate in mediation sessions re plan (3.9); review, analyze J. Dondero plan proposal and follow up re same (.2); review creditor analyses re plan issues (.3).	4.40
09/16/20	AF O'Neill	Review further drafts of trust agreement and communications with A. Russell and provide suggestions regarding same (.7); review changes and final draft for distribution to debtors (.6); review proposals from mediation and communications with team regarding same (.3) and follow-up communications with team regarding next steps (.2)	1.80
09/16/20	DM Twomey	Emails with team regarding claimant trust agreement (.20); review Dondero proposal (.10); emails with UCC/advisors regarding same (.20)	.50
09/16/20	A Russell	Revise claimant trust agreement (1.8); correspond with Sidley, Committee, and Pachulski re same (.4).	2.20
09/16/20	MA Clemente	Call with J. Pomerantz re: plan issues (.3); review schedule for hearings (.2)	.50
09/16/20	EA Bromagen	Call with E. Cheng re plan proposal (.3); review and analyze same plan proposal (.9); draft summary email to M. Clemente re same (.3)	1.50
09/17/20	SM Saddleton	Review Claimant Trust Deed re Investment Advisers Act issues (1.3); correspond with A. O'Neill regarding same (.2)	1.50
09/17/20	AF O'Neill	Meet with M. Clemente regarding mediation and next steps (.3); review communications with debtor on trust agreement and review same (.5); communications with S. Saddleton on same and suggestions on approach (.2); consider trustee dynamics and board approval mechanics (.4)	1.40
09/17/20	A Russell	Correspond with Pachulski and Sidley teams re claimant trust agreement issues and comments to same (.8); review, analyze	1.00

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Date	Name	Narrative	Hours
		update re exclusivity hearing (.2).	
09/17/20	MA Clemente	Analysis of 3018 and related insider issues	1.00
09/17/20	EA Bromagen	Review and revise plan documents (1.5); emails with E. Cheng and S. Saddleton re claimant trust agreement issues (.4)	1.90
09/18/20	SM Saddleton	Analyze SEC registration issues re HCM (.9); call with C. Daly regarding same (.6); respond to questions from Sidley team regarding same (0.5)	2.00
09/18/20	AF O'Neill	Communications regarding trust issues and review S. Saddleton analysis regarding same and consider approach/deal dynamics (.8); communications regarding plan and preliminary review of plan/disclosure statement (1.5)	2.30
09/18/20	A Russell	Correspond with Sidley and Pachulski teams re revised plan (.1); correspond with Sidley team re questions re claimant trust agreement (.3).	.40
09/18/20	C Daly	Call with S. Saddleton regarding proposed restructure and implications for change of controls and assignment and consent of client advisory agreement.	.60
09/18/20	MA Clemente	Review revised version of plan and DS (1.1); email with team re: plan review and related issues (.2)	1.30
09/18/20	MA Clemente	Address issues for oversight board	.50
09/18/20	EA Bromagen	Emails with S. Saddleton re plan issues	.50
09/18/20	EA Bromagen	Organize packages for candidates of post effective date roles including emails with M. Clemente re same	.50
09/20/20	AF O'Neill	Review plan/disclosure statement issues and A. Russell's issues list regarding same including analysis regarding same	.80
09/20/20	MA Clemente	Review A. Russell comments to revised plan (.4); review drafts of revised plan and disclosure statement (.6)	1.00
09/20/20	EA Bromagen	Email with M. Clemente re candidates for post effective date roles	.10
09/21/20	AF O'Neill	Multiple communications regarding plan issues and Redeemer approach and consider impact on trust agreement (.6); assess to plan mark-up from A. Russell including communications with team regarding same and outcome (.8)	1.40
09/21/20	A Russell	Review, comment on exclusivity order (.2); correspond with Sidley and Pachulski teams re same (.1); review, comment on plan (.9); correspond with Sidley and Pachulski teams re same (.3).	1.50
09/21/20	DM Twomey	Emails with team regarding filed plan, related issues	.30
09/21/20	MA Clemente	Review comments to plan (.5); communicate with various	3.30

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Date	Name	Narrative	Hours
		candidates for creditor trust roles (1.0); call with E. Bromagen re: information for RFP (.3); detailed email to Sidley team re: various issues including convenience class, releases and other issues (.4); call with A. Carr re: trustee role (.4); analysis of transferability (.3); analysis of interest issue (.4)	
09/21/20	EA Bromagen	Discuss RFP for post effective date roles with M. Clemente (.3); review of plan issues and emails with Sidley team re same (.5)	.80
09/22/20	A Russell	Review, analyze Debtor's filed plan (.6); correspond with Sidley team re same, open plan issues (.5); update plan issues list re same (.3); telephone conference with M. Clemente, M. Hankin and J. Bjork re plan issues and strategy (.6); correspond with Sidley and FTI teams re follow up from same (.4)	2.40
09/22/20	DM Twomey	Emails with M. Clemente, A. Russell regarding plan issue (.10); call with M. Clemente regarding same (.30)	.40
09/22/20	AF O'Neill	Review filed Plan and DS and changes to same (.9); analyze issues for DS approval/confirmation (.6); call with Debtors/board (.5); follow-up communications with Sidley team regarding same (.2); review convenience claim issues/analysis regarding voting issues and releases including analysis of same (.4)	2.60
09/22/20	MA Clemente	Revise RFP and email with E. Bromagen re: same (.4); address emails from potential candidates (.4); assess modifications to convenience class structure (.6); calls with various candidates for plan positions (.7)	2.10
09/22/20	EA Bromagen	Revise RFPs and compile packages for delivery to candidates (1.1); emails with M Clemente re revisions to same (.2); revisions to RFPs and document packages (.5)	1.80
09/23/20	A Russell	Correspond with Sidley and FTI teams re plan related issues and diligence, scheduling for RFP process.	.90
09/23/20	AF O'Neill	Attend call with FTI regarding claims and other issues for committee call (.5); multiple follow-up communications with team regarding plan issues, claims and approach on DS objections and analysis regarding same (.6)	1.10
09/23/20	DM Twomey	Emails with Sidley/FTI regarding convenience class, related information	.20
09/23/20	MA Clemente	Call with candidate for potential role (.2); call with potential candidate for litigation trustee (.5); analysis of convenience class treatment (.9); various emails with candidates for trust roles (.7); analysis of potential release structures (.8)	3.10
09/23/20	EA Bromagen	Review of research on plan interest issue	2.10

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Date	Name	Narrative	Hours
09/24/20	A Russell	Correspond with Sidley and Pachulski teams re plan supplement documents.	.50
09/24/20	AF O'Neill	Communications with Sidley team and FTI relating to Debtor sale motion and review underlying materials regarding same	.50
09/24/20	MA Clemente	Call with potential trustee (.5); call with potential oversight board and trustee candidate (.5); emails with potential candidates (.6); analysis of plan confirmation issues (.9)	2.50
09/24/20	EA Bromagen	Discuss various plan issues with G. Demo (.5); emails with M. Clemente re same (.4); review research on same issues (1.4).	2.30
09/25/20	A Russell	Analysis of open plan issues including correspondence with M. Clement for same (.7); correspond with E. Bromagen re research re plan issues (.3).	1.00
09/25/20	AF O'Neill	Communications with the committee regarding Trust agreement including review of Latham comments to same and consider mechanical issues on trust interest distributions/analysis regarding approach for same (1.0); review M. Clemente outline of open issues and consider approach on 3018 and related Plan timing and objections (.4); communications with Sidley team regarding causes of action and review E. Bromagen list of same (.3)	1.70
09/25/20	MA Clemente	Emails with E. Bromagen re: interviews (.4); analysis of confirmation issues (.6)	1.00
09/25/20	EA Bromagen	Analysis of plan issues including correspondence with M. Clemente regarding same (.5); emails with Sidley team re open plan issues (.2); draft retained causes of action supplement to plan and draft email to Sidley team re revisions to same (3.3); emails with M. Clemente re scheduling of candidate interviews (0.2)	4.20
09/27/20	EA Bromagen	Analyze claims and treatment under the Plan (3.9); emails with E. Cheng re same (.3)	4.20
09/28/20	AF O'Neill	Review communications regarding Plan/Trust issues, review work plan on DS/Plan pleadings and approach and analysis regarding same (.6); review multiple communications regarding debtor proposed settlement and analysis from FTI regarding same (.4); review communications from Sidley team regarding release issues and consider same (.2); review disclosure statement related pleadings from Debtors and consider same (.8)	2.00
09/28/20	A Russell	Review, analyze and correspond with Sidley team re plan questions (.9); review DS motion (.2).	1.10
09/28/20	MA Clemente	Email with E. Bromagen re: RFPs (.1); review task list for plan issues (.5); address discussions with potential trustee	2.10

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Date	Name	Narrative	Hours
		candidates (.3); review emails from E. Bromagen re; schedule (.3); analysis of convenience class structures (.9)	
09/28/20	EA Bromagen	Review workplan for plan and disclosure statement issues (.3); draft schedule for meetings with candidates for post effective date roles (.5); emails with M. Clemente and Committee re same (.3)	1.10
09/28/20	DM Twomey	Review emails with professionals re release proposal/structure (.20); emails with team regarding workplan and review same (.10)	.30
09/29/20	AF O'Neill	Review plan disclosure statement checklist and consider open items (.2); communications regarding asset sale and waterfall (.2); review matters for Wednesday calls and Debtors' deck on sale transaction including analysis regarding same (.5)	.90
09/29/20	A Russell	Correspond with Sidley team and review updates re: candidate interviews.	.40
09/29/20	MA Clemente	Call with oversight board candidate re: various issues (1.0); review and respond to emails from oversight board candidates (.5)	1.50
09/29/20	EA Bromagen	Schedule meetings with candidates and multiple emails with Committee and candidates re same (2.1); discuss oversight committee role with S. Saldana (.3)	2.40
09/30/20	AF O'Neill	Review work plan for calls (.2); call with Debtors regarding sale process and other case issues (.9)	1.10
09/30/20	A Russell	Telephone conferences with Sidley, FTI, Committee members and candidates re trustee and board positions (1.5); review, analyze materials re same (.3); correspond with Sidley team re questions re plan issues (.4); research re plan issues (1.1)	3.30
09/30/20	MA Clemente	Participate in trustee interviews (1.5); review materials in advance of trustee interviews (.5)	2.00
09/30/20	DM Twomey	Emails with team regarding plan questions	.10
09/30/20	EA Bromagen	Emails with Sidley team re oversight committee issue (.3); review of research on plan issues (1.2); attend calls with candidates for post effective date roles (1.5)	3.00
Task Subtotal			170.90
21 Tax			
09/11/20	ST Advani	Review Trust Agreement	.80
Task Subtotal			.80

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Date	Name	Narrative	Hours
24 Creditor Communications			
09/03/20	MA Clemente	Call with P. Daugherty re: various issues	.50
09/09/20	MA Clemente	Call with J. Terry re: various issues (.5); draft email to committee re: Acis, exclusivity and related issues (.4); email with P. McVoy re: questions (.1)	1.00
09/10/20	MA Clemente	Emails with LW re: trustee roles	.30
09/12/20	MA Clemente	Call with J. Bjork re: various issues	.40
09/14/20	MA Clemente	Call with J. Terry re: various issues	.50
09/16/20	MA Clemente	Call with J. Terry re: various issues	.50
09/17/20	MA Clemente	Call with P. Daugherty re: various issues	.40
09/20/20	MA Clemente	Email with M. Hankin re: oversight board	.10
09/21/20	MA Clemente	Call with M. Hankin re: various issues	.40
09/22/20	MA Clemente	Call with M. Hankin re: various issues (.2); call with M. Hankin re: various issues (.4); call with Hankin and Bjork re: various issues (.6); call with J. Terry re: various issues (.8); email from P. Daugherty re: settlements (0.1)	2.10
09/24/20	MA Clemente	Call with J. Terry re: various issues	.40
09/28/20	A Russell	Telephone conference with unsecured creditor re questions re plan.	.20
09/30/20	MA Clemente	Email from J. Terry re: trustees	.20
Task Subtotal			<u>7.00</u>
Total Hours for all Tasks			510.10

Exhibit B

Expense Detail

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Restructuring

EXPENSE DETAIL

Date	Narrative	Amount
07/29/20	06/30/20-Telephone Charges Conference Call	\$0.33
07/29/20	06/01/20-Telephone Charges Conference Call	12.17
09/09/20	08/10/20- Federal Express Corporation- TR #395673127786	45.63
09/09/20	08/17/20-Westlaw research service	233.81
09/10/20	09/09/20-Duplicating Charges (Color) Time: 16:19:00	0.29
09/10/20	09/09/20-Duplicating Charges (Color) Time: 14:40:00	1.74
09/10/20	09/09/20-Duplicating Charges (Color) Time: 12:15:00	0.58
09/10/20	09/09/20-Duplicating Charges (Color) Time: 11:33:00	3.19
09/10/20	09/09/20-Duplicating Charges (Color) Time: 12:05:00	0.87
09/11/20	09/10/20-Duplicating Charges (Color) Time: 18:04:00	0.29
09/11/20	09/10/20-Duplicating Charges (Color) Time: 16:53:00	0.29
09/11/20	09/10/20-Duplicating Charges (Color) Time: 18:45:00	0.29
09/11/20	09/10/20-Duplicating Charges (Color) Time: 14:23:00	0.58
09/11/20	09/10/20-Duplicating Charges (Color) Time: 14:28:00	8.12
09/11/20	07/14/20-Telephone Charges Conference Call	0.12
09/11/20	07/14/20-Telephone Charges Conference Call	0.37
09/11/20	07/08/20-Telephone Charges Conference Call	42.79
09/11/20	07/09/20-Telephone Charges Conference Call	0.36
09/11/20	07/09/20-Telephone Charges Conference Call	0.42
09/11/20	07/15/20-Telephone Charges Conference Call	45.21
09/11/20	07/22/20-Telephone Charges Conference Call	46.74
09/11/20	07/27/20-Telephone Charges Conference Call	0.36
09/11/20	07/29/20-Telephone Charges Conference Call	44.99
09/11/20	07/06/20-Telephone Charges Conference Call	0.01
09/11/20	07/06/20-Telephone Charges Conference Call	0.43
09/11/20	07/07/20-Telephone Charges Conference Call	0.14
09/11/20	07/30/20-Telephone Charges Conference Call	0.38
09/12/20	09/11/20-Duplicating Charges (Color) Time: 8:57:00	1.16

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Date	Narrative	Amount
09/12/20	09/11/20-Duplicating Charges (Color) Time: 16:10:00	8.12
09/12/20	09/11/20-Duplicating Charges (Color) Time: 18:08:00	8.12
09/12/20	09/11/20-Duplicating Charges (Color) Time: 8:49:00	0.58
09/12/20	09/11/20-Duplicating Charges (Color) Time: 12:31:00	0.29
09/12/20	09/11/20-Duplicating Charges (Color) Time: 16:03:00	2.32
09/16/20	09/15/2020 - COURTCALL LLC - 972250920	100.00
09/17/20	09/16/20-Duplicating Charges (Color) Time: 15:58:00	1.45
09/17/20	09/16/20-Duplicating Charges (Color) Time: 17:46:00	3.19
09/17/20	09/16/20-Duplicating Charges (Color) Time: 18:06:00	1.74
09/17/20	09/16/20-Duplicating Charges (Color) Time: 10:48:00	0.29
09/17/20	09/16/20-Duplicating Charges (Color) Time: 15:41:00	0.29
09/17/20	09/16/20-Duplicating Charges (Color) Time: 15:12:00	0.29
09/17/20	09/16/20-Duplicating Charges (Color) Time: 8:55:00	0.29
09/17/20	09/16/20-Duplicating Charges (Color) Time: 10:48:00	1.74
09/17/20	09/16/20-Duplicating Charges (Color) Time: 10:48:00	0.29
09/17/20	09/16/20-Duplicating Charges (Color) Time: 10:51:00	0.29
09/17/20	09/16/20-Duplicating Charges (Color) Time: 9:47:00	0.29
09/17/20	09/16/20-Duplicating Charges (Color) Time: 9:34:00	1.45
09/18/20	09/17/20-Duplicating Charges (Color) Time: 14:56:00	0.87
09/18/20	09/17/20-Duplicating Charges (Color) Time: 11:18:00	1.16
09/18/20	09/17/20-Duplicating Charges (Color) Time: 11:19:00	19.43
09/18/20	09/17/20-Duplicating Charges (Color) Time: 11:18:00	2.90
09/18/20	09/17/20-Duplicating Charges (Color) Time: 11:18:00	1.16
09/18/20	09/17/20-Duplicating Charges (Color) Time: 11:19:00	2.03
09/18/20	09/17/20-Duplicating Charges (Color) Time: 11:25:00	0.87
09/18/20	09/17/20-Duplicating Charges (Color) Time: 8:59:00	3.48
09/18/20	09/17/20-Duplicating Charges (Color) Time: 14:54:00	2.61
09/18/20	09/17/20-Duplicating Charges (Color) Time: 14:54:00	0.29
09/18/20	Sep 13, 2020 - Juliana Hoffman - Transcript Fees - Transcript	296.45
09/19/20	09/18/20-Duplicating Charges (Color) Time: 12:34:00	0.58
09/19/20	09/18/20-Duplicating Charges (Color) Time: 12:33:00	0.29

SIDLEY AUSTIN LLP

Invoice Number: 40061913
 Official Committee of Unsecured

Restructuring

Date	Narrative	Amount
09/19/20	09/18/20-Duplicating Charges (Color) Time: 13:09:00	13.05
09/22/20	09/21/20-Duplicating Charges (Color) Time: 10:55:00	2.90
09/23/20	E-Discovery Monthly Service Fee	836.00
09/23/20	Electronic Data Hosting	103.50
09/25/20	09/24/20-Duplicating Charges (Color) Time: 16:12:00	0.58
09/25/20	09/24/20-Duplicating Charges (Color) Time: 16:00:00	0.87
09/25/20	09/24/20-Duplicating Charges (Color) Time: 9:02:00	3.48
09/29/20	08/24/20-Telephone Charges Conference Call Customer: HMC6052 MATTHEW A CLEMENTE	11.04
09/29/20	09/08/20-Westlaw research service	140.28
09/30/20	09/30/20-Duplicating Charges (Color) Time: 9:35:00	0.29
09/30/20	09/30/20-Duplicating Charges (Color) Time: 12:15:00	0.58
09/30/20	09/30/20-Duplicating Charges (Color) Time: 11:34:00	0.29
09/30/20	09/30/20-Duplicating Charges (Color) Time: 14:36:00	11.60
09/30/20	09/30/20-Duplicating Charges (Color) Time: 14:36:00	6.67
09/30/20	09/30/20-Duplicating Charges (Color) Time: 12:51:00	0.29
09/30/20	09/30/20-Duplicating Charges (Color) Time: 12:50:00	2.32
09/30/20	07/07/2020-Postage	1.60
09/30/20	09/27/2020 - ON TIME COURIERS INC - 316324	43.73
09/30/20	Sep 25, 2020 - Juliana Hoffman - Transcript Fees - Hearing Transcript	70.85
Total		\$2,204.73